

RICHARD WORLEY V. DEPUTY DANNY LAWRENCE, ET AL.
Bryant Griffin - 08/15/2018

DEPOSITION OF BRYANT GRIFFIN

DATE: WEDNESDAY, AUGUST 15, 2018
PLACE: GORE, KILPATRICK & DAMBRINO
2000 GATEWAY, SUITE 160
JACKSON, MISSISSIPPI
TIME: 11:26 a.m.

BETHANY CAMMACK
Certified Shorthand Reporter
Mississippi CSR No. 1526

Ex B

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1	APPEARANCES	
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1	BRYANT GRIFFIN,	
2	having been first duly sworn,	
3	was examined and testified as follows:	
4	EXAMINATION	
5	BY MR. CLARKE:	
6	Q. Would you please state your name?	
7	A. My name is Bryant O'Neal Griffin, Sr.	
8	Q. And where do you live?	
9	A. I live here in Grenada, for 51 years. All	
10	my life. 110 Sunflower Drive, Grenada,	
11	Mississippi.	
12	Q. And have you ever given a deposition	
13	before?	
14	A. No, sir.	
15	Q. Okay. Because you haven't given a	
16	deposition, I want to go over some ground rules.	
17	Okay?	
18	A. Okay.	
19	Q. Obviously you're under oath here, and your	
20	testimony is subject to the penalty of perjury.	
21	You understand that?	
22	A. Yes, sir.	
23	Q. A lot of times when we get into a	
24	conversation with people, you know, we anticipate	
25	what they're going to say and start answering	

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1 MS. GRIFFITH: Object to the form.	1 THE WITNESS: No, he didn't tell me
2 MR. CLARKE CONTINUED:	2 nothing about that.
3 Q. All right. Now, once -- okay. So what	3 MR. CLARKE CONTINUED:
4 all did Strider say when you told him that?	4 Q. Did you have to talk to anybody else about
5 A. He told me I can't be using that kind of	5 what happened?
6 force on a handcuffed person. And I told him I	6 A. No more than. . .
7 understand. Now I do.	7 Q. Not your lawyers. Did you speak to your
8 Q. Did he fire you?	8 lawyers at any time?
9 A. No. He laid me off. I been laid off ever	9 A. No, sir.
10 since it happened.	10 Q. I'm not asking you any conversations with
11 Q. So you've been laid off since 12/24/16?	11 that. I'm talking about people from Grenada.
12 A. Yes, sir.	12 A. No, sir.
13 Q. All right. Have you gone to any other	13 Q. All right. Danny Lawrence, tell me what
14 training or anything since then?	14 he knows about this case that you're aware of.
15 A. No, sir.	15 A. Everything I just told you, that I -- that
16 Q. Did you get any paperwork saying you were	16 I'm aware of.
17 laid off?	17 Q. So Danny Lawrence was there when you
18 A. No, sir.	18 punched him three times?
19 Q. He just told you, "We don't need you until	19 A. Was he there?
20 this lawsuit's over"?	20 Q. Yeah. Was he in the sally port?
21 A. Yes, sir.	21 A. Yes, sir.
22 Q. Did you have any type of -- did he say,	22 Q. Did he see it?
23 "We're going to investigate this through internal	23 A. I don't know if he seed it or not, but he
24 affairs" or anything?	24 was in the sally port.
25 MS. GRIFFITH: Object to the form.	25 Q. Did you ever talk to him about that you
Page 36	
1 hit him?	1 A. He started cussing.
2 A. No, sir.	2 Q. Okay. Did he --
3 Q. Did you talk to Randy Sweat about that?	3 A. Calling me the N word and, "I'm going to
4 A. I told Randy I had to punch him two or	4 kill you." Told me he's going to make me suck his
5 three times.	5 private part before he killed me.
6 Q. And where was Deputy Lawrence when you	6 Q. All right. And then you hit him again,
7 punched him?	7 right?
8 A. I can't -- I can't remember. I think he	8 A. Not because of that.
9 was on the other side of the truck. He was letting	9 Q. I'm just going chronologically.
10 the door down.	10 A. I hit him again because he was still
11 Q. Of the sally port?	11 trying to come at me and bite me.
12 A. Yeah.	12 Q. All right. I'm not asking you that. I'm
13 Q. Where was Officer -- Deputy Sweat?	13 asking the chronology. Before you hit him the
14 A. I think he was behind me.	14 first time, he said, "Don't touch me," correct?
15 Q. Did you hear -- did you say anything to	15 A. Yes, sir.
16 Mr. Worley during this time?	16 Q. After that, he cussed you, called you the
17 A. I told him -- I told him to calm down.	17 N word, told you he was going to kill you, and he
18 Q. All right. Did Mr. Worley say anything to	18 was going to make you suck his dick?
19 you?	19 A. Yes, sir.
20 A. Yes, sir.	20 Q. And then you hit him again, correct?
21 Q. Did he say anything to you before you	21 A. No, sir. After he came at me and tried to
22 punched him the first time?	22 bit me again, that's when I hit him again the
23 A. Yes, sir. He told me don't touch him.	23 second time. And after I spinned him around, he
24 Q. And after you hit him the first time, then	24 tried to kick me in my groin, and I hit him a third
25 did he say anything?	25 time.

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<p style="text-align: right;">Page 38</p> <p>1 Q. I'm trying to just -- my question is 2 asking you -- we already -- I already understand 3 you allege that he tried to bite you. Okay. I'm 4 trying to find out anything that was said in 5 between the three punches. Okay? The first one, 6 before you hit him the first time, he said, "Don't 7 touch me," correct?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Before you hit him the second time, he 10 called you the N word. He told you -- he said he 11 was going to make you suck his dick, and --</p> <p>12 A. Well, after -- after that, he just 13 repeated the same thing over and over.</p> <p>14 Q. Okay.</p> <p>15 A. "I'm going to kill you, nigger. Before I 16 kill you, you're going to suck me." And he just 17 kept saying the same thing over and over.</p> <p>18 Q. And you hit him again?</p> <p>19 A. Yeah. After he tried to kick me, I hit 20 him again.</p> <p>21 Q. Well, no, I'm -- let's break this down. 22 First punch, before you hit him the first time, he 23 said, "Don't touch me."</p> <p>24 A. Yeah. Before I even hit him the first 25 time, he told me don't touch him.</p>	<p style="text-align: right;">Page 39</p> <p>1 Q. And then you say he tried to bite you, and 2 you hit him in the face?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Okay. Then after you hit him in the face, 5 then he started saying --</p> <p>6 A. Cursing and --</p> <p>7 Q. Cursing and saying the N word?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Saying he was going to make you suck his 10 dick?</p> <p>11 A. Yes.</p> <p>12 Q. And you hit him again, correct?</p> <p>13 A. Yes, sir.</p> <p>14 Q. And then you turned him to the side?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Turned him to get him out of the truck, 17 his seat?</p> <p>18 A. Get him out of the truck.</p> <p>19 Q. And did he say anything? Was he still 20 saying the same thing?</p> <p>21 A. Still saying the same thing.</p> <p>22 Q. Still saying the same thing.</p> <p>23 MS. GRIFFITH: Object to the form. I 24 think, just for clarification, during all of this, 25 he was threatening to kill him. I'm not sure he</p>
<p style="text-align: right;">Page 40</p> <p>1 said that.</p> <p>2 MR. CLARKE: That's -- you can object 3 to the form, but . . .</p> <p>4 MS. GRIFFITH: Okay. Thanks.</p> <p>5 MR. CLARKE CONTINUED:</p> <p>6 Q. And then he was saying those same things 7 again as you turned his legs around to get him out?</p> <p>8 A. Yes, sir.</p> <p>9 Q. And then you say he tried to kick you?</p> <p>10 A. Yes, sir.</p> <p>11 Q. And you punched him again in the face?</p> <p>12 A. Yes, sir.</p> <p>13 Q. All right. Now --</p> <p>14 A. I don't think he probably really meant 15 that he was going to kill me or nothing like that, 16 because he was intoxicated. I could smell the 17 alcohol beverage. As far as what he had to drink, 18 I couldn't tell you.</p> <p>19 But, like, I know he probably was mad at 20 me because I -- you know, I hit him in the face. I 21 understand that. But, I mean, none of us would 22 have took no bite from nobody, you know.</p> <p>23 Q. I mean, and if he didn't try to bite you, 24 then --</p> <p>25 A. If he wouldn't have never -- this ain't my</p>	<p style="text-align: right;">Page 41</p> <p>1 first time carrying somebody to jail. If wouldn't 2 have never tried to bite me, I wouldn't have never 3 hit him. I don't -- unloaded people at the sally 4 port before, I ain't never had no trouble. And I 5 worked every weekend. Every weekend.</p> <p>6 Q. I understand. My guy says it didn't 7 happen. So . . .</p> <p>8 A. Yeah.</p> <p>9 Q. He said it didn't even happen there. So 10 we're going to get to that.</p> <p>11 A. Yes.</p> <p>12 Q. All right. But Danny Lawrence was, you 13 think, trying to close the sally port, but he was 14 in the sally port?</p> <p>15 A. Yeah. He was in the sally port, but he 16 was on the other side of the truck.</p> <p>17 Q. Randy Sweat was behind you?</p> <p>18 A. Yes, sir, he was behind me.</p> <p>19 Q. And to be clear, Mr. Worley did not bite 20 you and did not actually kick you?</p> <p>21 A. No, sir.</p> <p>22 Q. All right. Tim Gholston, you have him 23 down here. What does Tim Gholston know? Was he in 24 the sally port?</p> <p>25 A. He was in the sally port, but he was in</p>

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<p style="text-align: right;">Page 42</p> <p>1 front of his pickup truck. He wasn't nowhere close 2 to me like Randy Sweat was. Randy Sweat was the 3 only one really close to me.</p> <p>4 Q. Did he come to you or assist you in any 5 way in the sally port?</p> <p>6 A. Who? Tim?</p> <p>7 Q. Yeah.</p> <p>8 A. Yeah. He come over there and, you know, 9 tried to break us up or whatever, get me away from 10 him.</p> <p>11 Q. Did anybody tell you don't punch him?</p> <p>12 A. They told me to stop. Yeah, they told me 13 to stop.</p> <p>14 Q. Who told you to stop?</p> <p>15 A. Tim Gholston, Randy Sweat.</p> <p>16 Q. All right. Donny Willis, what does he 17 know about this?</p> <p>18 A. Donny Willis wasn't out there.</p> <p>19 Q. Do you know Donny Willis?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Did you know that -- prior to you punching 22 Mr. Worley, do you know whether or not Mr. Worley 23 had said anything racially derogatory of Donny 24 Willis or Sonja Willis?</p> <p>25 A. Not to my knowledge.</p>	<p style="text-align: right;">Page 43</p> <p>1 Q. So Donny Willis, you wrote him -- you 2 don't think he has any information about that?</p> <p>3 A. I didn't put Donny down.</p> <p>4 Q. Well, you did. You signed this.</p> <p>5 A. Donny was not there.</p> <p>6 Q. Okay. Well, I understand. And he was 7 named in the lawsuit, and that -- you may be just 8 putting him for that. But I'm just trying to ask 9 you what you know about these people.</p> <p>10 A. Oh, I know both of them.</p> <p>11 Q. Do you know --</p> <p>12 A. I went to school with both of them.</p> <p>13 Q. Do you know Donny Willis -- do you know if 14 he has information pertaining to this incident?</p> <p>15 A. To my case?</p> <p>16 Q. Yeah.</p> <p>17 A. I don't -- I don't know.</p> <p>18 Q. Okay. Barbara Kitchens, do you know 19 anything about her?</p> <p>20 A. No, sir.</p> <p>21 Q. Marilyn Bibbs?</p> <p>22 A. No, sir.</p> <p>23 Q. Jamica Hankins?</p> <p>24 A. No, sir.</p> <p>25 Q. Linda Evans?</p>
<p style="text-align: right;">Page 44</p> <p>1 A. No, sir.</p> <p>2 Q. Who is Linda Evans?</p> <p>3 A. I don't know.</p> <p>4 Q. Josephine Hubbard?</p> <p>5 A. I don't know.</p> <p>6 Q. Patricia Moody?</p> <p>7 A. I don't know.</p> <p>8 Q. Sonja Willis?</p> <p>9 A. I know Sonja.</p> <p>10 Q. Do you know if she knows anything -- have 11 you talked to her about this?</p> <p>12 A. I haven't talked to her about this case, 13 and I don't know if she knows anything about it, 14 but she was not in the sally port either.</p> <p>15 Q. Richard Busby?</p> <p>16 A. I don't know him.</p> <p>17 Q. You don't even know who he is?</p> <p>18 A. No, sir.</p> <p>19 Q. Calvin Roach?</p> <p>20 A. No, sir.</p> <p>21 Q. All right. If we go to Interrogatory No. 22 10 -- it's on page 7. If you look at the 23 interrogatory number, it says, "Please state with 24 specificity and in chronological order the exact 25 sequence of events from the time that you became</p>	<p style="text-align: right;">Page 45</p> <p>1 aware of and/or involved in the incident involving 2 the plaintiff," who is Mr. Worley, "until you 3 completed your shift assignment and returned to 4 your home." Do you see that?</p> <p>5 A. Uh-huh (affirmative response).</p> <p>6 Q. All right. I want you to read over that 7 response here, and then I'm going to ask you some 8 questions about it.</p> <p>9 A. (Reviewing document.) Okay.</p> <p>10 Q. Based on what you've told me today, would 11 you agree that this interrogatory response is very 12 misleading?</p> <p>13 A. Yeah, I agree with it.</p> <p>14 Q. You agree that it's misleading, or you 15 agree --</p> <p>16 A. No, sir. I agree with it that it's right.</p> <p>17 Q. Did you say in this interrogatory response 18 that you hit him ever?</p> <p>19 A. I don't think I did. In the report, I 20 didn't.</p> <p>21 Q. Well, you understand about half truths, 22 right?</p> <p>23 A. Yes, sir.</p> <p>24 Q. You know what this lawsuit was about. You 25 got a copy of the lawsuit, right?</p>